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19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**
21 **SOUTHERN DIVISION**

22 RENO MAY, an individual;
23 ANTHONY MIRANDA, an individual;
24 ERIC HANS, an individual; GARY
25 BRENNAN, an individual; OSCAR A.
26 BARRETTO, JR., an individual;
27 ISABELLE R. BARRETTO, an
28 individual; BARRY BAHRAMI, an
individual; PETE STEPHENSON, an
individual; ANDREW HARMS, an
individual; JOSE FLORES, an
individual; DR. SHELDON HOUGH,
DDS, an individual; SECOND
AMENDMENT FOUNDATION; GUN
OWNERS OF AMERICA; GUN
OWNERS FOUNDATION; GUN
OWNERS OF CALIFORNIA, INC.;
THE LIBERAL GUN CLUB, INC.; and
CALIFORNIA RIFLE & PISTOL
ASSOCIATION, INCORPORATED,

Plaintiffs,

v.

ROBERT BONTA, in his official
capacity as Attorney General of the
State of California, and DOES 1-10,

Defendants.

Case No.: 8:23-cv-01696 CJC (ADSx)

**DECLARATION OF JOSE FLORES
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

42 U.S.C. §§ 1983 & 1988

Hearing Date: December 4, 2023
Hearing Time: 1:30 p.m.
Courtroom: 9 B
Judge: Hon. Cormac J. Carney

DECLARATION OF JOSE FLORES

1. I, Jose Flores, am a plaintiff in the above-entitled action. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the truth of the matters set forth herein.

2. I am a current resident of Fresno County, California.

3. I am a law-abiding adult who is not prohibited from owning firearms under the laws of the United States of America or the state of California. I have never been found by any law enforcement agency, any court, or any other government agency to be irresponsible, unsafe, or negligent with firearms in any manner. I am a member of the California Rifle & Pistol Association, another plaintiff in this matter.

4. I have recently been approved for a California concealed carry weapon ("CCW") permit with the Fresno County Sheriff's Department and expect to receive it soon in the mail.

5. I am a first-generation Mexican American small business owner and advocate for our Second Amendment rights. I come from a family of entrepreneurs who own multiple businesses in Fresno. During my high school years, in January 2012, a tragic incident occurred right outside our family's small restaurant. Witnessing a brutal murder where a man was mercilessly stabbed multiple times deeply impacted me. It was a transformative experience that reinforced my unwavering belief in the importance of the right to self-defense and the Second Amendment. Since I became eligible to purchase a firearm, I have been an avid gun owner, with a genuine interest in protecting and preserving our constitutional right to keep and bear arms.

6. While SB 2 will obviously limit me from carrying nearly everywhere once I have my permit, the law affects me in a slightly more unique way as well. I am the owner and operator of Flores Flooring Solutions, a small business in Fresno which includes a showroom open to the public. Plenty of people in Fresno have CCW permits, and I have no issue with such individuals carrying in my showroom.

1 Citizens with CCW permits aren't the ones I worry about when it comes to crime,
2 as I know that criminals don't bother going through the legal process to get a
3 permit. If anything, those with CCW permits make me feel safer, and I want to
4 continue to treat them as welcome customers in my business.


5 7. However, given my background as a business owner, I understand the
6 implications of having signage that indicates concealed carry is permitted. It forces
7 my business to publicly take a position on a contentious issue and may needlessly
8 alienate customers who oppose gun rights. Further, I don't want to be a part of
9 legitimizing California's unconstitutional scheme by agreeing to put up such a sign
10 if I want to support the Second Amendment. Americans generally have the right to
11 carry firearms and shouldn't need to have permission to do so at every private
12 business they visit. If a business like mine wants to make it known that we prohibit
13 carry, it can put up a sign saying so, just as businesses have traditionally done for
14 all sorts of things they want to declare not allowed on their property.

15 8. Moreover, burglary and theft are a frequent concern for any business in
16 California, and I fear putting up a "guns allowed" sign may make my business an
17 even more desirable target for thieves, because they may believe I store firearms on
18 the premises.

19 9. For all those reasons, and for my own right to carry once I get my CCW
20 permit, I sincerely hope this court enjoins SB 2.

21 I declare under penalty of perjury that the foregoing is true and correct.
22 Executed on September 29, 2023.

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Jose Flores

CERTIFICATE OF SERVICE
IN THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Case Name: *May, et al. v. Bonta*
Case No.: 8:23-cv-01696 CJC (ADSx)

IT IS HEREBY CERTIFIED THAT:

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.

I am not a party to the above-entitled action. I have caused service of:

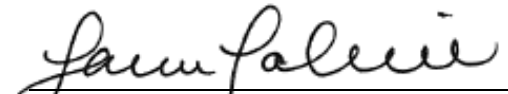
**DECLARATION OF JOSE FLORES IN SUPPORT OF PLAINTIFFS'
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on the following party by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies them.

Robert L. Meyerhoff, Deputy Attorney General
California Department of Justice
300 South Spring Street, Suite 1702
Los Angeles, CA 90013
Email: Robert.Meyerhoff@doj.ca.gov
Attorney for Defendant

I declare under penalty of perjury that the foregoing is true and correct.

Executed September 29, 2023.



Laura Palmerin